



May 19, 2021

**Via ECF**

Hon. Sylvia H. Rambo  
U.S. Federal Building and Courthouse  
228 Walnut Street, Room 860  
Harrisburg, PA 17101

**Re: Harrison, et al. v. Brew Vino, LLC, et al.**  
**Docket No. 1:20-cv-00666-SHR**

Dear Judge Rambo:

We represent the plaintiffs, Sandra Harrison and Carolyn Dow (“Plaintiffs”), in the above-referenced matter. On May 5, 2021, Your Honor issued an Order granting Plaintiffs costs and attorneys’ fees associated with responding to Defendants’ Motion to Vacate Default Judgment (Doc. No. 21) and Motion for Reconsideration of the Court’s Order Denying Defendants’ Motion to Vacate Default Judgment (Doc. No. 25); and required Plaintiffs’ counsel to submit a declaration of services within fourteen (14) days of the date of the Order (Doc. No. 28). Accordingly, enclosed please find the Declaration of Services and proposed Order.

Thank you for your consideration in this matter.

Respectfully submitted,

**DEREK SMITH LAW GROUP, PLLC**

/s/ Ian M. Bryson, Esquire  
IAN M. BRYSON, ESQUIRE

cc: Kathryn Nonas-Hunter, Esq. (*via ECF*)

**DEREK SMITH LAW GROUP, PLLC**

IAN M. BRYSON, ESQUIRE

Attorney ID No. 321359

1835 Market Street, Suite 2950

Philadelphia, PA 19103

(215) 391-4790

ian@dereksmithlaw.com

*Attorneys for Plaintiffs Sandra Harrison and Carolyn Dow*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

SANDRA HARRISON *and*  
CAROLYN DOW,

Plaintiffs,

v.

BREW VINO, LLC., et al.,

Defendants.

Civil Action No. 1:20-cv-00666-SHR

**DECLARATION OF IAN M. BRYSON,  
ESQUIRE**

I, Ian M. Bryson, Esq., do hereby **DECLARE UNDER OATH** and state as follows:

1. I am an attorney of the law firm Derek Smith Law Group, PLLC, attorneys for Plaintiffs Sandra Harrison and Carolyn Dow in the above titled action. I am managing this case. I make this Declaration in support of Plaintiffs' request for an award of counsel fees and costs. I am authorized to make this Declaration.
2. On May 5, 2021, the Court issued an Order granting Plaintiffs costs and attorneys' fees associated with responding to Defendants' Motion to Vacate Default Judgment (Doc. No. 21) and Defendants' Motion for Reconsideration of the Court's Order Denying Defendants' Motion to Vacate Default Judgment (Doc. No. 25). See Doc. No. 28, the Court's May 5, 2021 Order.

3. The May 5, 2021 Order further provided that counsel for Plaintiffs shall submit a declaration of services within fourteen (14) days of the Order. See id.
4. I am an attorney licensed in good standing in the Commonwealth of Pennsylvania.
5. I am admitted to practice in the Middle District of Pennsylvania.
6. I focus my practice in civil rights and complex civil litigation.
7. I am lead trial counsel for Plaintiffs in this action.
8. My hourly rate for legal services is \$500.00 per hour. This is within the typical range of prevailing market rates charged by attorneys with similar experience performing similar work in this geographic region and in this area of law.
9. While expressly reserving the attorney-client and attorney work product privileges, the tasks I performed related solely to the filing of Plaintiffs' responses in opposition to Defendants' Motion to Vacate Default Judgment and Motion for Reconsideration of the Court's Order Denying Defendants' Motion to Vacate Default Judgment included the following:

DATE	ATTORNEY	SERVICES	HOURS	AMOUNT
12/22/2020	Ian M. Bryson, Esq. ("IMB")	Draft opposition to motion to vacate default judgment	3.5	\$1,750.00
12/23/2020	IMB	Draft opposition to motion to vacate default judgment	2.4	\$1,200.00
12/28/2020	IMB	Draft opposition to motion to vacate default judgment	2.5	\$1,250.00
01/02/2021	IMB	Review and revise opposition to motion to	1.8	\$900.00

		vacate default judgment		
01/04/2021	IMB	Review and revise opposition to motion to vacate default judgment	1.2	\$600.00
01/04/2021	IMB	Finalize brief and certification of counsel in support of Plaintiffs' opposition to motion to vacate default judgment	1	\$500.00
03/21/2021	IMB	Draft opposition to motion for reconsideration of Court Order denying motion to vacate default judgment	1.2	\$600.00
03/22/2021	IMB	Review and finalize opposition to motion for reconsideration of Court Order denying motion to vacate default judgment	.8	\$400.00
<b>TOTALS:</b>			14.4	\$7,200.00

10. Accordingly, Plaintiffs have incurred a total of \$7,200.00 in legal fees in connection with responding to Defendants' motions.

11. I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

**DEREK SMITH LAW GROUP, PLLC**

Dated: May 19, 2021

By: /s/ Ian M. Bryson, Esq.  
Ian M. Bryson, Esquire

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

SANDRA HARRISON *and*  
CAROLYN DOW,

Plaintiffs,

v.

BREW VINO, LLC., et al.,

Defendants.

Civil Action No. 1:20-cv-00666-SHR

**ORDER GRANTING ATTORNEYS'  
FEES AND COSTS**

**THIS MATTER** having been presented to the Court by Ian M. Bryson, Esq. and Derek Smith Law Group, PLLC, attorneys for Plaintiffs Sandra Harrison and Carolyn Dow, for an Order granting fees and costs associated with responding to Defendants' Motion to Vacate Default Judgment (Doc. No. 21) and Motion for Reconsideration of the Court's Order Denying Defendants' Motion to Vacate Default Judgment (Doc. No. 25), and the Court having considered the moving papers, Declaration of counsel, and any opposition thereto, and for good cause shown;

**IT IS** on this \_\_\_\_\_ day of \_\_\_\_\_. 2021, **ORDERED** that Plaintiffs' motion is hereby **GRANTED**.

**IT IS FURTHER ORDERED** that Defendants shall pay Derek Smith Law Group, PLLC \$7,200.00 within thirty (30) days from the date of this Order.

\_\_\_\_\_  
SYLVIA H. RAMBO  
United States District Judge